

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TONYA A. FAVOT,)	
)	
Plaintiff,)	Case No. 3:18-cv-1274
)	
v.)	Judge Richardson
)	Magistrate Judge Brown
NISSAN NORTH AMERICA, INC., and)	
JAMES ADAMS,)	Jury Demand
)	
Defendants.)	

**MOTION TO WITHDRAW AS COUNSEL,
EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT,
CONTINUE REMAINING DEADLINES,
AND FOR EXPEDITED HEARING**

Counsel for the plaintiff, Tonya A. Favot, respectfully moves the Court for an order permitting him to withdraw as counsel in this action. On November 6, 2019, Ms. Favot unequivocally terminated undersigned counsel's representation after being made aware in writing of potential consequences of the termination to her case, including but not limited to the likely necessity of a continuance. Counsel respectfully submits that, in addition to the discharge, professional considerations require termination of the representation and that other good cause exists for withdrawal.

Plaintiff further requests that, in light of counsel's discharge and withdrawal, the Court extend her time to respond to Defendant Nissan's Motion for Summary Judgment (Doc. 79) by 90 days, from November 8, 2019, to February 6, 2020, and continue all remaining deadlines, including those in the Court's Trial Management Order (Doc. 60), by 90 days so that Ms. Favot may employ other counsel if she has not already done so. Undersigned counsel will cooperate with any successor counsel Ms. Favot engages and provide him or her copies of the file material

in this case, the vast majority of which counsel has provided to Ms. Favot throughout the course of the representation.

Counsel is serving a copy of this motion on Ms. Favot by electronic mail and U.S. Mail at her email and street addresses, which are:

Tonya A. Favot
210 Hillwood Blvd., Apt. 421
Murfreesboro, TN 37128
tonya.favot@yahoo.com

Due to the pending motions and deadlines in this case and counsel's November 6, 2019, discharge, Plaintiff requests an expedited hearing of this motion.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion and enter an order permitting undersigned counsel to withdraw, extending her deadline to respond to Defendant Nissan's Motion for Summary Judgment by 90 days to February 6, 2020, and continuing all remaining deadlines in this case by 90 days.

Respectfully submitted,

s/Douglas B. Janney III
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that I electronically filed and served this Motion to Withdraw, to Extend Time to Respond to Motion for Summary Judgment and Continue Remaining Deadlines, and for Expedited Hearing using the Court's CM/ECF system upon Kenneth A. Weber and Megan M. Sutton, Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C., 211 Commerce Street, Suite 800, Nashville, Tennessee 37201 and Tracey A. Kinslow, Kinslow Law Group, 810 Dominican Drive, Nashville, Tennessee 37228 on November 6, 2019.

s/Douglas B. Janney III

Douglas B. Janney III